SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

PART I
GENERAL INFORMATION

ORIGINAL (Red)

1. Name of facility Pennzoil Company (Etowah Terminal)
2. Type of facility Onshore Storage and Transfer Facility
3. Location of facility 1015 Barlow Drive
   Charleston, WV 25333
4. Name and address of owner or operator:
   Name Pennzoil Company
   Address P. O. Box 2967
   Houston, TX 77292-2967
5. Designated person accountable for oil spill prevention at facility:
   Name and title William Haynes, Tankerman
6. Facility experienced a reportable oil spill event during the twelve months prior to Jan. 10, 1974 (effective date of 40 CFR, Part 112). (If YES, complete Attachment #1.) No

MANAGEMENT APPROVAL

This SPCC Plan will be implemented as herein described.

Signature R J Similo
Name Ronald J. Similo
Title Division Manager

CERTIFICATION

I hereby certify that I have examined the facility, and being familiar with the provisions of 40 CFR, Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices.

B R LAWRENCE
Printed Name of Registered Professional Engineer

(Seal)

Signature of Registered Professional Engineer

Date 6/30/83

Registration No. 16398 State La

7. Potential Spills — Prediction & Control:

ORIGINAL (Red)

	Source	Major Type of Failure	Total Quantity (bbls)	Rate (bbls/hr)	Direction of Flow*	Secondar Containm
1.	Storage tanks	Corrosion, Overfilling, Rupture	415,800 gal.	Varies	Varies	Dikeage
2.	In-Plant piping	Corrosion, Rupture	Varies	Varies	Varies	See below
3.	Truck Load/ Unload	Rupture, Overfill	4,000 gal.	Varies	Varies	See below
4.	Barge Handling	Hose, Rupture, Overfill	2,000 gal.	Varies	Varies	See below

Discussion:

2. Most above ground piping is within the diked area. Other piping with exception to the barg supply line is located on the east side of the dikes away from the river. A spill on the
3. Spills at loading racks will be contained in the immediate area. barge supply line would be containe spill boom.

4. All barge activity will require a tankerman to be on site with a boat and sufficient length of spill boom to contain a release. Also, drip pans are present to contain hose residual.

*Attach map if appropriate.

Name of facility _____

Operator _____

PART I
GENERAL INFORMATION

[Response to statements should be: YES, NO, or NA (Not Applicable).]

ORIGINAL COPY

8. Containment or diversionary structures or equipment to prevent oil from reaching navigable waters are practicable. (If NO, complete Attachment #2.) NO

9. Inspections and Records
   A. The required inspections follow written procedures. NO
   B. The written procedures and a record of inspections, signed by the appropriate supervisor or inspector, are attached. NO
   Discussion: All areas of the facility are walked at least once daily by Pennzoil personnel and all tanks, valves and above ground pipelines are visually inspected at this time. Any leaks discovered are reported and repaired immediately. Records are kept of the maintenance performed.

   All barge hose is hydrostatically tested annually with records kept of this.

10. Personnel, Training, and Spill Prevention Procedures
   A. Personnel are properly instructed in the following:
   (1) operation and maintenance of equipment to prevent oil discharges, and YES
   (2) applicable pollution control laws, rules, and regulations. YES
   Describe procedures employed for instruction: At least annually, supervisors will conduct a meeting on site with all personnel to review this plan and its objectives.

   B. Scheduled prevention briefings for the operating personnel are conducted frequently enough to assure adequate understanding of the SPCC Plan. YES
   Describe briefing program: Briefings are held annually and highlight any spill events that might have occurred, potential spill exposures, malfunctioning components and any new precautionary measures that can be taken to prevent a spill.

Name of facility _____

Operator _____

PART II. ALTERNATE A
DESIGN AND OPERATING INFORMATION
ONSHORE FACILITY (EXCLUDING PRODUCTION)

ORIGINAL (Red)

A. Facility Drainage

1. Drainage from diked storage areas is controlled as follows (include operating descripti of valves, pumps, ejectors, etc. *(Note: Flapper-type valves should not be used)*:

All dike areas have valves that permit release of accumulated rainfall. These valves are kept closed at all times.

2. Drainage from undiked areas is controlled as follows (include description of ponds, lagoo or catchment basins and methods of retaining and returning oil to facility):

The truck unloading area is designed such that a ditch parallel to the roadway collects surface runoff. A valve is present to release accumulate water into the river. This accumulation is inspected before release to assure no oil gets into the river.

3. The procedure for supervising the drainage of rain water from secondary containment i a storm drain or an open watercourse is as follows (include description of (a) inspection pollutants, and (b) method of valving security). (A record of inspection and drainage eve is to be maintained on a form similar to Attachment #3):

Prior to draining any diked areas, the inside of the dike is given a visual inspection. If any oil or residue is present in the dike, this material is either pumped away to storage or is cleaned up with absorbant pads. The source of the oil is then investigated and the leak stopped. If there is no contamination in the dike area, the dike drain is manually opened and the employee remains in close proximity to the valve. When the draining is complete, the valve is manually close.

Name of facility _____

Operator _____

PART II. ALTERNATE A
DESIGN AND OPERATING INFORMATION
ONSHORE FACILITY (EXCLUDING PRODUCTION)

[Response to statements should be: YES, NO, or NA (Not Applicable).]

ORIGINAL (Red)

B. Bulk Storage Tanks

1. Describe tank design, materials of construction, fail-safe engineering features, and if needed, corrosion protection: All tanks are materially and structurally compatible with their contents. All are of either riveted or welded mild steel plate construction, and of sufficient strength to safely withstand such pressures and temperatures as can be reasonably expected during their use. All meet applicable API specifications.

2. Describe secondary containment design, construction materials, and volume: Dikes are of masonry construction and of a capacity adequate to contain the contents of the largest tank and still have sufficient freeboard for rainwater accumulation. The volume of the largest tank here is 415,800 gal.

3. Describe tank inspection methods, procedures, and record keeping: All tanks are visually inspected daily during gauging. Due to corrosion possibilities, all are periodically inspected for thickness as access affords, or as prudent safeguarding dictates. Those tanks, if found faulty as a result of the inspection, are repaired or replaced before returning to service. Records are kept of such repairs.

4. Internal heating coil leakage is controlled by one or more of the following control factors:
   (a) Monitoring the steam return or exhaust lines for oil. N/A
   Describe monitoring procedure:
   (b) Passing the steam return or exhaust lines through a settling tank, skimmer, or other separation system. N/A
   (c) Installing external heating systems. N/A

5. Disposal facilities for plant effluents discharged into navigable waters are observed frequently for indication of possible upsets which may cause an oil spill event. N/A
   Describe method and frequency of observations:

Name of facility

Operator

PART II, ALTERNATE A
DESIGN AND OPERATING INFORMATION
ONSHORE FACILITY (EXCLUDING PRODUCTION)

[Response to statements should be: YES, NO, or NA (Not Applicable).]

ORIGINAL (Red)

C. Facility Transfer Operations, Pumping, and In-plant Process

1. Corrosion protection for buried pipelines:
   (a) Pipelines are wrapped and coated to reduce corrosion. No
   (b) Cathodic protection is provided for pipelines if determined necessary by electrolytic testing. No
   (c) When a pipeline section is exposed, it is examined and corrective action taken as necessary. Yes

2. Pipeline terminal connections are capped or blank-flanged and marked if the pipeline is not in service or on standby service for extended periods. Yes
   Describe criteria for determining when to cap or blank-flange: Any line which is out of service for maintenance or temporarily shut down is isolated by capping or blank blank-flanging.

3. Pipe supports are designed to minimize abrasion and corrosion and allow for expansion and contraction. Yes
   Describe pipe support design: Pipe supports are constructed of either concrete or steel and designed to minimize abrasion and corrosion.

4. Describe procedures for regularly examining all above-ground valves and pipelines (including flange joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces): All pumps, valves, pipes and fittings are routinely inspected by the operators as a part of their operating duty. Leaks or failures are immediately reported to the supervisor and promptly repaired.

5. Describe procedures for warning vehicles entering the facility to avoid damaging above-ground piping: All in-plant roadways used by vehicles are well defined and clear of above ground transfer systems.

Name of facility _____

Operator _____

DESIGN AND OPERATING INFORMATION
ONSHORE FACILITY (EXCLUDING PRODUCTION)

[Response to statements should be: YES, NO, or NA (Not Applicable).]

ORIGINAL (Red)

D. Facility Tank Car & Tank Truck Loading/Unloading Rack

Tank car and tank truck loading/unloading occurs at the facility. (If YES, complete 1 through 5 below.) Yes

1. Loading/unloading procedures meet the minimum requirements and regulations of the Department of Transportation. Yes

2. The unloading area has a quick drainage system. Yes

3. The containment system will hold the maximum capacity of any single compartment of a tank truck loaded/unloaded in the plant. Yes
   Describe containment system design, construction materials, and volume: Any spill in this area is directed to a ditch on the east side of the loading rack which will contain the product for clean up.

4. An interlocked warning light, a physical barrier system, or warning signs are provided in loading/unloading areas to prevent vehicular departure before disconnect of transfer lines. Yes
   Describe methods, procedures, and/or equipment used to prevent premature vehicular departure: Warning signs are located at all loading/unloading areas. In addition, regular operating procedure requires that prior to departure an inspection be made to ensure that all lines are disconnected, valves tightly shut, and that there are no leaks.

5. Drains and outlets on tank trucks and tank cars are checked for leakage before loading/unloading or departure. Yes

Name of facility _____

Operator _____

PART II. ALTERNATE A
DESIGN AND OPERATING INFORMATION
ONSHORE FACILITY (EXCLUDING PRODUCTION)

ORIGINAL (Red)

[Response to statements should be: YES, NO, or NA (Not Applicable).]

F. Security

1. Plants handling, processing, or storing oil are fenced. Yes

2. Entrance gates are locked and/or guarded when the plant is unattended or not in production. Yes

3. Any valves which permit direct outward flow of a tank's contents are locked closed when in non-operating or standby status. Yes

4. Starter controls on all oil pumps in non-operating or standby status are:
   (a) locked in the off position; No
   (b) located at site accessible only to authorized personnel. Yes

5. Discussion of items 1 through 4 as appropriate: The facility is fully surrounded by a cyclone fence, locked when unattended.

   All tank water draw-off valves remain locked at all times when not in operation.

   Switches to pumps are not locked. However, main electrical disconnect switches are shut off to de-energize all pumps not in use. These disconnect switches are located within the locked confines of the buildings.

6. Discussion of the lighting around the facility: The plant is equipped with dust to dawn lighting located so that any spill, vandalism, or mischievous conduct would be readily detected.

Name of facility _____

Operator _____

SPCC PLAN: ATTACHMENT #1

SPILL HISTORY

(Complete this form for any reportable spill(s) which has (have) occurred from this facility during the twelve months prior to January 10, 1974 into _____ navigable water.)

ORIGINAL (Red)

1. Date _____ Volume _____ Cause: _____

"See Attached Report"

Corrective action taken: _____

Plans for preventing recurrence: _____

2. Date _____ Volume _____ Cause: _____

Corrective action taken: _____

Plans for preventing recurrence: _____

3. Date _____ Volume _____ Cause: _____

Corrective action taken: _____

Plans for preventing recurrence: _____

Name of facility _____

Operator _____

SPCC PLAN, ATTACHMENT #2
OIL SPILL CONTINGENCY PLANS AND
WRITTEN COMMITMENT OF MANPOWER

Secondary containment or diversionary structures are impracticable for this facility for the following reasons (attach additional pages if necessary):

ORIGINAL (Red)

Barge activity affords no positive means of secondary containment due to the physical layout of the dock. Therefore, to contain a spill, our contingency plan call for a boat to be available with sufficient spill boom and sorbent material to collect any release of oil at this site due to hose rupture or overfill. Manpower to be utilized will come from our employees assisted by the barge crew.

Yes

A strong oil spill contingency plan is attached. Yes

A written commitment of manpower is attached. Yes

Name of facility _____

Operator _____

SPCC PLAN. ATTACHMENT =3
ONSHORE FACILITY BULK STORAGE TANKS
DRAINAGE SYSTEM

Inspection Procedure:

ORIGINAL (Red)

Prior to draining any diked areas, the inside of the dike is given a visual inspection. If any oil or residue is present in the dike, this material is either pumped away to storage or is cleaned up with absorbant pads. The source of the oil is then investigated and the leak stopped. If there is no contamination in the dike area, the dike drain is manually opened and the employee remains in close proximity to the valve. When the drainage is complete, the valve is manually closed.

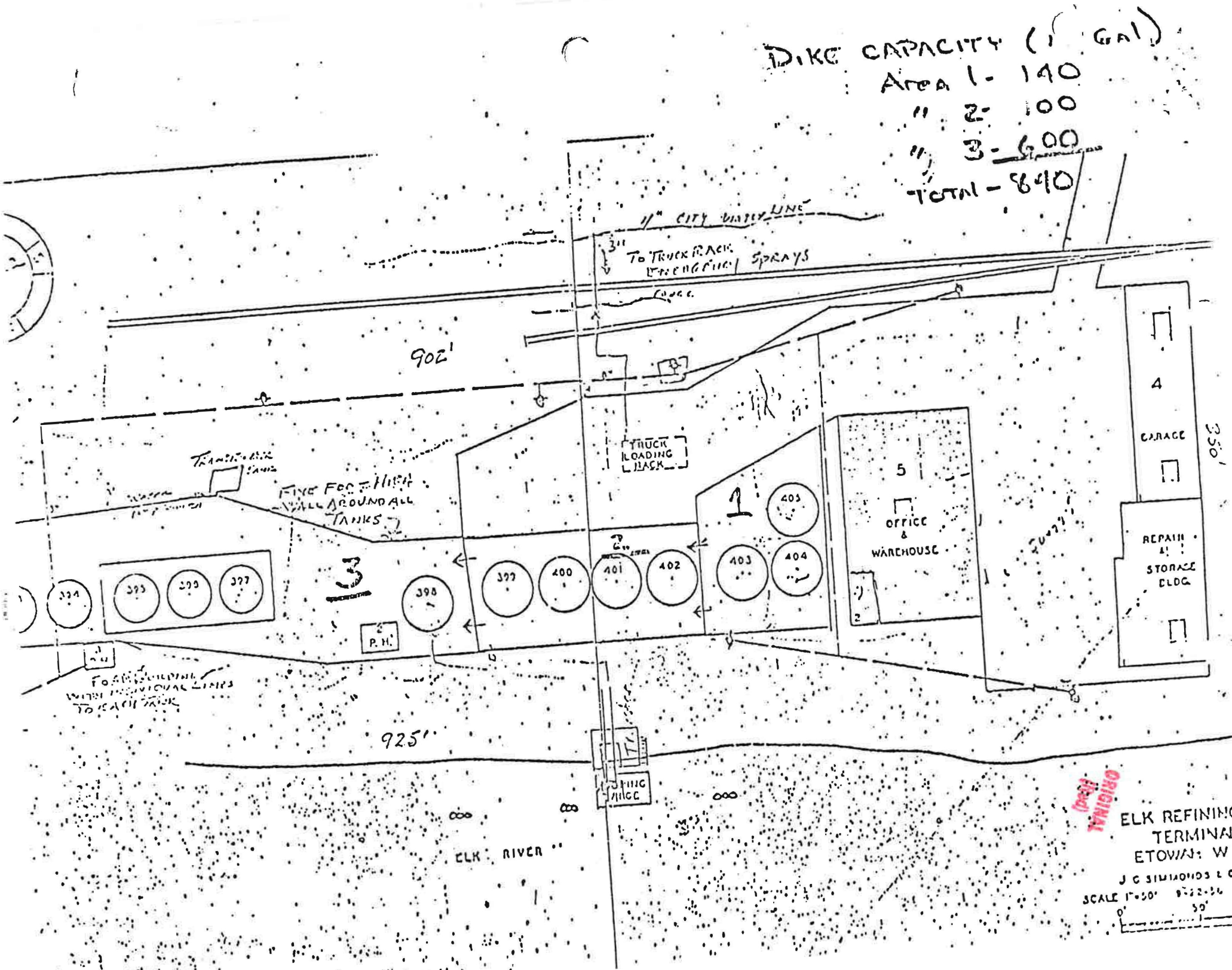
Record of drainage, bypassing, inspection, and oil removal from secondary containment:

Date of Drainage	Date of Bypassing		Date of Inspection	Oil Removal	Supervisor's or Inspector's Signature
	Open	Closed			

Name of facility _____

Operator _____

(Attachment =3, SPCC Plan)


DIKE CAPACITY (1 GAL)
Area 1 - 140
" 2 - 100
" 3 - 600
TOTAL - 840
11" CITY WATER LINE
3"
To Truck Rack Emergency Sprays
902'
Truck Loading Rack
Five Foot High Wall Around All Tanks
5
OFFICE & WAREHOUSE
4
GARAGE
REPAIR & STORAGE BLDG.
350'
1
3
399
398
397
400
401
402
403
404
P.H.
925'
ELK RIVER
ORIGINAL
ELK REFINING
TERMINAL
ETOWAH W
SCALE 1"=50'

WEK

MAR 21 REC'D

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

ORIGINAL (Red)

IN REPLY REFER TO: 3HW22

PENNZOIL
1015 BARLOW DRIVE
CHARLESTON, WV. 25333

MAR 18 1988

RE: WV88131 2-3-88 CHARLESTON, WV.

Gentlemen:

This office has received notification that your facility discharged oil or hazardous materials in quantities that may be harmful, in violation of Section 311(b)(3) of the Federal Water Pollution Control Act Amendments of 1972, 33 U.S.C. § 1321(b)(3). Pursuant to Section 308(a), 33 U.S.C. § 1318(a), you are hereby required to submit to EPA the following information. Any person who violates Section 308 is subject to a civil penalty of up to $10,000 per day of violation. 33 U.S.C. § 1319(d). Further, any person who willfully or negligently violates Section 308 may be punished by a fine of not less than $2,500, nor more than $25,000 per day of violation, or by imprisonment for not more than one year or both. 33 U.S.C. § 1319(c)(1).

1. Does the facility have a National Pollutant Discharge Elimination System (NPDES) Permit? YES or NO Yes
   If YES, state the Permit number: WV0045225

2. Does the facility currently have a Resource Conservation and Recovery Act (RCRA) Permit or is the facility under Interim Status?

   No

3. Does the facility have a Spill Prevention Control and Countermeasure (SPCC) Plan certified and implemented in accordance with 40 CFR 112?

   YES or NO: Yes

4. Time and date of discharge.

   Discharge began sometime after 4 PM ceased at approximately 11:30 PM (eastern) February 3, 1988

5. Date and time of discovery that the discharge was entering the waterways.

   Between 9 PM and 10 PM (eastern) February 3, 1988

ORIGINAL (Red)

6. Description of the vehicle or facility from which the material was discharged (i.e., pipeline, tank, well, etc.):

Tank truck over flow

7. Name and address of the owner of the vehicle or facility described above in (6).

Par Mar Oil Company

PO Box 1026

Marietta, OH 45750

8. Name and address of the operator of the vehicle or facility described above in (6) and, if different from (7) above, describe the relationship between the owner and operator (i.e., employee, subcontractor, lessee, etc.)

Louis Woods - Driver

Employee of Par Mar Oil Company

9. Location of the discharge, including county and state.

Pennzoil Products Company

Charleston, WV 25333 Kanawha County

10. List the type of oil and total storage capacities at the facility for any oil related products. Describe the storage tanks at the facility, (e.g., above ground, underground, etc.)

* See attached

11. Material(s) discharged.

Diesel Fuel

12. Quantity of material discharged from the facility or vehicle.

Approximately 120 gallons

13. Did the material enter into any water? (YES or NO) Yes

ORIGINAL (Red)

Did the material enter into any sewer? (YES or NO) No

(a) If YES, describe the first water reached and the location of this water.

The Elk River located in Kanawha County, Charleston, WV

(b) State the quantity of material entering the water described above in 13(a).

Approximately 50-60 gallons

(c) State the quantity of material reaching the shoreline of the water described above in 13(a) which did not enter the water.

Approximately 50-60 gallons

(d) Was the water described above in 13(a), at the time of the spill, a tributary of, or physically connected to a hydrological or creek system? (YES or NO) Yes

(e) If the answer to 13(d) is YES, describe or name the waterways to which the waters in 13(a) connect or flow.

The spill entered into the Elk River which flows into the Kanawha River and eventually joins into the Ohio River.

(f) If the answer to 13(d) is NO, does the water described above in 13(a) periodically connect with or flow into any hydrological or creek system? If YES, describe the flow and connection.

14. Did the discharge violate any applicable water quality standards, (e.g., NPDES)? If YES, describe:

No

15. Did the material cause a film, sheen, discoloration or irridescent appearance on the adjoining shorelines of, or surface of, any water described above in 13(a) (e) or (f)? If YES, describe:

ORIGINAL (Red)

No

16. Did the material cause any sludge or emulsion to be deposited on the adjoining shorelines of, or beneath the surface of, the waters described above in 13(a) (e) or (f)? If YES, describe:

No

17. Describe any observed damage to animal life or vegetation.

None observed

18. Describe in detail what actually caused the discharge.

The tank truck driver, a customer's employee, over flowed his truck compartment. The product spilled onto the ground.

19. Describe steps taken to contain and clean up the spilled material and mitigate environmental damage.

The spill area and collection ditch were cleaned

20. Describe action taken or proposed to prevent a recurrence of this type of spill.

Discussion with this particular driver as well as others as to proper notification if an emergency occurs while they are loading during off-terminal hours. Also looking into proposals for spill containment pads at the truck loading rack.

21. List the federal and state agencies, if any, to which the owner or operator reported the discharge. Show the agency, its location, the date and time of notification and the official contacted.

ORIGINAL (Red)

WVA DNR

National Spill Response Center

22. List the state and local officials who were on-scene at the spill during or after clean up.

After clean-up WVA DNR Representative made inspection of sight issuing clean bill.

23. List the names and addresses of persons believed to have knowledge of the facts surrounding this incident.

No one was present at the terminal after the driver left with his load.

24. List any other information you wish to bring to the attention of the federal government.

The above information should be mailed to:

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III
REMOVAL RESPONSE SECTION (3HW25)
841 CHESTNUT STREET
PHILADELPHIA, PA 19107

If you cannot answer this letter by APR 1 1 1988 or if there are any questions on this matter, you may call Carol Oleksiak at (215) 597-0496.

Sincerely,

Stephen Jarvela, Chief
Removal Response Section

Signature Edd F. Kaye Jr.
I hereby certify the above to be true and accurate to the best of my knowledge.

This information request is not subject to review by the Director of OMB pursuant to the requirements of the Paperwork Reduction Act, 44 U.S.C. § 3507.

ORIGINAL (Red)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

January 27, 1990

Commander (mep)
2nd Coast Guard District
1430 Olive Street
St. Louis, MO 63101

RE: WV90040

Gentlemen:

The enclosed case file documents a spill of approximately 1 Quart of Diesel Oil at Charleston, WV located in Kanawha County, within the 2nd Coast Guard District. The spill ocurred on November 1, 1989 and entered the Elk River to Kanawha River to Ohio River.

The spill caused a visible film, sheen, emulsion or a discoloration upon the surface of the Elk River; a harmful quantity of oil as defined by 40 CFR 110.3. The incident was a violation of Section 311 (b)(3) of the Federal Water Pollution Control Act, as amended.

It is recommended that civil penalty action pursuant to Section 311 (b)(6) of the FWPCA be considered in this case.

If there are any questions, or if we can provide additional assistance, please call Charles Kleeman at (215) 597-4018.

Sincerely,

Stephen R. Wassersug, Director
Hazardous Waste Management Division

Enclosures

1990

ORIGINAL (Red)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

NOV 8 1989

Pennzoil
1015 Barlow Street
Charleston, WV 25333

RE: WV90040 11/1/89 Same As Above

Gentlemen:

This office has received notification that your facility discharged oil or hazardous materials in quantities that may be harmful, in violation of Section 311(b)(3) of the Federal Water Pollution Control Act Amendments of 1972, 33 U.S.C. § 1321(b)(3). Pursuant to Section 308(a), 33 U.S.C. § 1318(a), you are hereby required to submit to EPA the following information. Any person who violates Section 308 is subject to a civil penalty of up to $10,000 per day of violation 33 U.S.C. § 1319(d). Further, any person who willfully or negligently violates Section 308 may be punished by a fine of not less than $2,500, nor more than $25,000 per day of violation, or by imprisonment for not more than one year or both. 33 U.S.C. § 1319(c)(1).

1. Does the facility have a National Pollutant Discharge Elimination System (NPDES) Permit? YES or NO Yes
   If YES, state the Permit number: WV 0045225

2. Does the facility currently have a Resource Conservation and Recovery Act (RCRA) Permit or is the facility under Interim Status?

   No

3. Does the facility have a Spill Prevention Control and Countermeasure (SPCC) Plan certified and implemented in accordance with 40 CFR 112?

   YES or NO: Yes

4. Time and date of discharge.

   10:30AM, 11/1/89

5. Date and time of discovery that the discharge was entering the waterways.

   10:30AM, 11/1/89

ORIGINAL (Red)

6. Description of the vehicle or facility from which the material was discharged (i.e., pipeline, tank, well, etc.):

Barge hose

7. Name and address of the owner of the vehicle or facility described above in (6).

Pennzoil Products Co.

1015 Barlow Drive

Charleston, WV 25333

8. Name and address of the operator of the vehicle or facility described above in (6) and, if different from (7) above, describe the relationship between the owner and operator (i.e., employee, subcontractor, lessee, etc.)

Same

9. Location of the discharge, including county and state.

Charleston, Kanawha County, WV

10. List the type of oil and total storage capacities at the facility for any oil related products. Describe the storage tanks at the facility, (e.g., above ground, underground, etc.)

Type-Diesel, kerosene, gasoline, motor oil

Total storage - 4,225,000 gal.

11. Material(s) discharged.

Diesel

12. Quantity of material discharged from the facility or vehicle.

1.0 quart

13. Did the material enter into any water? (YES or NO) Yes

Did the material enter into any sewer? (YES or NO) No

(a) If YES, describe the first water reached and the location of this water.
Elk River, 2.5 miles from mouth of Elk River as it enters Kanawha River, Charleston, WV

(b) State the quantity of material entering the water described above in 13(a).
1.0 quart

(c) State the quantity of material reaching the shoreline of the water described above in 13(a) which did not enter the water.
None

(d) Was the water described above in 13(a), at the time of the spill, a tributary of, or physically connected to a navigable waterway. (YES or NO) Yes

(e) If the answer to 13(d) is YES, describe or name the waterways to which the waters in 13(a) connect or flow.
Elk River into Kanawha

(f) If the answer to 13(d) is NO, does the water described above in 13(a) periodically connect with or flow into any hydrological or creek system? If YES, describe the flow and connection.
---

14. Did the discharge violate any applicable water quality standards, (e.g., NPDES)? If YES, describe:
No

ORIGINAL (Red)

15. Did the material cause a film, sheen, discoloration or irridescent appearance on the adjoining shorelines of, or surface of, any water described above in 13(a) (e) or (f)? If YES, describe:

Yes, sheen was 10 ft. wide x 30 ft. long

16. Did the material cause any sludge or emulsion to be deposited on the adjoining shorelines of, or beneath the surface of, the waters described above in 13(a) (e) or (f)? If YES, describe:

No

17. Describe any observed damage to animal life or vegetation.

None

18. Describe in detail what actually caused the discharge.

Water pumped from Elk River thru barge hose to tank For tank #403's hydrotest. When water drained back to Elk River, 1.0 quart of diesel was in pipeline or barge hose.

19. Describe steps taken to contain and clean up the spilled material and mitigate environmental damage.

River boom deployed immediately

Absorbent pads picked up diesel.

20. Describe action taken or proposed to prevent a recurrence of this type of spill.

At end of hydrotest, the first discharge back to the river will be in a drum. At the bottom of the tank draining, a sheen will be in the tank on top of the water. This water is discharged into the dike area for treatment under our NPDES permit. We have always discharged the last water into the dike area for treatment.

ORIGINAL (Red)

21. List the federal and state agencies, if any, to which the owner or operator reported the discharge. Show the agency, its location, the date and time of notification and the official contacted.

a. Amer. Water Works Service, Charleston, WV 10:45 + 11:00am Homer Clark - all on 11/1/89

b. National Response Center, St. Louis, Mo., 11am, Mr. Brantley Case #19410

c. WV Dept. Nat. Resources, Charleston, WV, 11:15am, Dave Cunningha

22. List the state and local officials who were on-scene at the spill during or after clean up.

None

23. List the names and addresses of persons believed to have knowledge of the facts surrounding this incident.

William Haynes, c/o Pennzoil Products, 1015 Barlow Drive, Charleston, WV 25333 PH: 304-346-5222

24. List any other information you wish to bring to the attention of the federal government.

Although it was a very small spill, we were obligated to report it under the law. It was completely cleaned up.

The above information should be mailed to:

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III
WESTERN RESPONSE & OIL ENFORCEMENT SECTION (3HW32)
841 CHESTNUT STREET
PHILADELPHIA, PA 19107

If you cannot answer this letter by 11/30/89, or if there are any questions on this matter, you may call Carol Oleksiak at (215) 597-0496.

Sincerely,

Charles Kleeman, Chief
Western Response and
Oil Enforcement Section

Signature: Robert R. Ables

I hereby certify the above to be true and accurate to the best of my knowledge.

This information request is not subject to review by the Director of OMB pursuant to the requirements of the Paperwork Reduction Act, 44 U.S.C. § 3507.

02/02/90

PENNZOIL COMPANY

ORIGINAL (Red)

'73445	11FEB87	Sycamore Creek, Roane Co., WV	$200.00	01/20/88
2P73464	27MAY87	Rush Run, Harrison Co., WV	$75.00	02/05/88
2P73466	22MAY87	Reedy Creek, Roane Co., WV	$500.00	02/05/88
2P73488	26AUG87	Rock Creek, Roane Co., WV	$200.00	07/20/88
2P73504	08DEC87	One Mile Creek, Kanawha Co., WV	$300.00	11/16/88
2P73506	22DEC87	Riggins Run, Doddridge Co., WV	$200.00	11/16/88
02940000301400	03FEB88	Elk River, Kanawha Co., WV	$1000.00	01/30/89
02940000308100	25APR88	Rock Creek, Roane Co., WV	$250.00	01/30/89
02940000316000	11FEB88	Banner Run, Roane Co., WV(2P83472)	$100.00	02/02/90
02340000320700	17MAR88	Rock Creek, Roane Co., WV	$150.00	02/02/90
02940000325900	25MAY89	Price Creek, Wetzel Co., WV	$150.00	09/11/89
02940000328500	15MAY89	Buffalo Creek, Washington Co., PA	$100.00	10/05/89
02940000323400	25APR89	Sycamore Creek, Roane Co., WV	$200.00	11/07/89
02940000331800	20AUG89	Rock Creek, Roane Co., WV	$250.00	11/07/89
02040000302100	27AUG89	Granny's Creek, Clay Co., WV	$250.00	01/10/90
02040000302500	02OCT89	Sycamore Creek, Calhoun Co., WV	$150.00	01/10/90
02040000304100	12OCT89	Left Fork of Sandy Creek, Clay Co., WV	$100.00	01/10/90

ATTACHMENT I

Facility Name and Address

Pennzoil Products Company (Etowah Terminal)

1015 Barlow Dr.

Charleston, WV 25333

As required per 40 CFR 112.5(b), I have reviewed this SPCC plan and, to the best of my knowledge it remains current and accurate.

Name	Title	Signature	Date
1). Charles W. Hartsell, Jr.	1). Marine & Terminal Adm. (Off-Site M	1). Charles W. Hartsell Jr.	1). August 3, 1989
2). John L. Hutchinson	2). Branch Manager (On-Site Manager)	2). John L. Hutchinson	2). 8-7-89

Attach to existing SPCC plan and send a copy to:

Michael S. Ishimoto
Pennzoil Company
P. O. Box 2967
Houston, Texas 77252-2967